REMARKS

Claims 1-37 are pending. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks herein.

Claim Objections

Claim 4 is objected to because of informalities. More specifically, the Examiner has objected to claim 4 stating that there is insufficient antecedent basis for the limitations "the first virtual task", and "the second virtual task.

Applicants have amended claim 4 to depend from claim 3, which provides proper antecedent basis for the above-described features. Therefore, reconsideration and withdrawal of the objection are respectfully requested.

Claim Rejections – 35 USC § 102

Claims 1, 3-5, 9-12, 15-16, 18-20, 24-27, and 30 are rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 5,630,069 to Flores et al. ("Flores"). This rejection is respectfully traversed.

When applying a reference under 35 U.S.C. §102, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."[1] Further, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim."[2] As discussed in further detail below, Flores does not describe each and every element of claims 1 and 16, and fails to show the identical subject matter as is contained in either claim 1 or 16.

As amended herein, each of claims 1 and 16 further includes a first workflow view representing an abstracted first workflow, the first workflow view expressing virtual tasks of the first workflow as first vertices within a first matrix, and a second workflow view representing an abstracted second workflow, the second workflow view expressing virtual tasks of the second workflow as first vertices within a first matrix. Flores fails to disclose either a first workflow

[1] *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)
[2] *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)

view representing an abstracted first workflow, the first workflow view expressing virtual tasks of the first workflow as first vertices within a first matrix, or a second workflow view representing an abstracted second workflow, the second workflow view expressing virtual tasks of the second workflow as first vertices within a first matrix.

Flores describes a method and apparatus for creating workflow maps of business processes. More specifically, Flores describes a unified tool, with which business process analysis, design, and documentation can be performed (see col. 1, lines 7-10). Each business process is made up of a sequence of workflows, each of which includes a customer, a performer, and conditions of satisfaction (see col. 1, lines 19-22). The tool of Flores generates workflow maps, which display workflows as loops, displays relevant information about each workflow, and displays relationships among workflows (col. 1, line 64-col. 2, line 2, and col. 7, lines 28-30). In the workflow maps, the workflows are graphically represented as elliptical loops having four phases (see col. 7, lines 41-42).

Flores does not disclose the features of abstracted workflows, much less expressing tasks of a workflow as vertices of a matrix. As discussed in detail above, the focus of Flores is to provide a graphical tool, which graphically represents workflows as elliptical loops. Consequently, Flores does not disclose a first workflow view representing an abstracted first workflow, the first workflow view expressing virtual tasks of the first workflow as first vertices within a first matrix, or a second workflow view representing an abstracted second workflow, the second workflow view expressing virtual tasks of the second workflow as first vertices within a first matrix.

In view of the foregoing, Flores fails to describe each and every element of claims 1 and 16, and fails to show the identical subject matter as is contained in either claim 1 or 16. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Each of claims 3-5, 9-12, 15, 18-20, 24-27, and 30 ultimately depends from one of claims 1 and 16, which define over the asserted art, as discussed in detail above. Therefore, each of claims 3-5, 9-12, 15, 18-20, 24-27, and 30 also define over the asserted art for at least the same reasons, and reconsideration and withdrawal of the rejections are respectfully requested.

Claim Rejections – 35 USC § 103

Claims 2 and 17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Flores in view of U.S. Pat. No. 7,184,966 to Parsonnet et al. ("Parsonnet"). This rejection is respectfully traversed.

Each of claims 2 and 17 ultimately depends from one of claims 1 and 16, which define over the asserted art, as discussed in detail above. Therefore, each of claims 2 and 17 also define over the asserted art for at least the same reasons, and reconsideration and withdrawal of the rejections are respectfully requested.

Claims 6-8, 13-14, 21-23, 28-29, and 31-37 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Flores in view of U.S. Pat. No. 5,826,020 to Randell ("Randell"). This rejection is respectfully traversed.

Each of claims 6-8, 13-14, 21-23, and 28-29 ultimately depends from one of claims 1 and 16, which define over the asserted art, as discussed in detail above. Therefore, each of claims 6-8, 13-14, 21-23, and 28-29 also define over the asserted art for at least the same reasons, and reconsideration and withdrawal of the rejections are respectfully requested.

Claim 31 has been amended herein to include the features of a first view modeler operable to model a first virtual workflow as an abstracted first workflow, the first view modeler expressing virtual tasks of the first workflow as first vertices within a first matrix of a first workflow view. Flores fails to teach or suggest a first view modeler operable to model a first virtual workflow as an abstracted first workflow, the first view modeler expressing virtual tasks of the first workflow as first vertices within a first matrix of a first workflow view.

As discussed in detail above, Flores describes a tool that generates workflow maps, which display workflows as loops, displays relevant information about each workflow, and displays relationships among workflows (col. 1, line 64-col. 2, line 2, and col. 7, lines 28-30). The workflows are graphically represented as elliptical loops having four phases (see col. 7, lines 41-42). Flores does not disclose the features of abstracted workflows, much less expressing tasks of a workflow as vertices of a matrix. As discussed in detail above, the focus of Flores is to provide a graphical tool, which graphically represents workflows as elliptical loops. Consequently, Flores does not teach or suggest a first view modeler operable to model a first

virtual workflow as an abstracted first workflow, the first view modeler expressing virtual tasks of the first workflow as first vertices within a first matrix of a first workflow view.

Randell fails to cure the deficient disclosure of Flores. More specifically, Randell describes a workflow system that defines the workflow necessary to complete a work procedure, and manage the workflow for each instance (see col. 2, lines 23-26). More specifically, the workflow system of Randell is embodied in a software program that provides a graphical user interface (GUI). The workflow system of Randell automates processes for completing an overall procedure to guarantee that all individual activities of the overall procedure are done in a defined sequence, form, and time (see col. 3, lines 61-65). Randell does not teach or suggest a first view modeler operable to model a first virtual workflow as an abstracted first workflow, the first view modeler expressing virtual tasks of the first workflow as first vertices within a first matrix of a first workflow view.

In view of the foregoing, neither Flores, nor Randell teach or suggest a first view modeler operable to model a first virtual workflow as an abstracted first workflow, the first view modeler expressing virtual tasks of the first workflow as first vertices within a first matrix of a first workflow view. Accordingly, Flores and Randell, either alone or in combination, fail to render the subject matter of claim 31 obvious.

Each of claims 32-37 ultimately depends from claims 31, which defines over the asserted art, as discussed in detail above. Therefore, each of claims 32-37 also define over the asserted art for at least the same reasons, and reconsideration and withdrawal of the rejections are respectfully requested.

CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to amendment.

No charges are believed due. However, if any fees are due, they are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 13909-026001.

Respectfully submitted,

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